

SEALED

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Western District of Texas

FILED

AUG 07 2014

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXASBY MS DEPUTY CLERKUnited States of America
v.
STACY LOUISE CASTILLOCase No. MO 14-MJ-347Defendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 05/13/2014 in the county of Ector in the
Western District of Texas, the defendant(s) violated:*Code Section*

21 U.S.C 841 (a)(1)

Offense Description

It shall be unlawful for any person knowingly or intentionally manufacture, distribute, or possess with intent to manufacture, distribute or dispense, a controlled substance.

21 U.S.C 846

Any person who attempts or conspires to commit an offense defined in this subchapter shall be subject to the same penalties as those prescribed for the offense, the commission of which was the object of the attempt or conspiracy.

This criminal complaint is based on these facts:

See Affidavit

☒ Continued on the attached sheet.
Complainant's signatureJoshua J. Pirtle, FBI, Special Agent
Printed name and title

Sworn to before me and signed in my presence.

Date: 8/7/2014
Judge's signatureCity and state: Midland, TexasDavid Counts, United States Magistrate Judge
Printed name and title

Affidavit

Affiant, Joshua J. Pirtle, Special Agent, Federal Bureau of Investigation, being duly sworn, deposes and says;

This affidavit is made in support of a criminal complaint charging Stacy Castillo with conspiracy to possess with intent to distribute a controlled substance in violation of Title 21 USC section 846 and Title 21 section 841(a)(1).

Affiant has been a Special Agent employed by the Federal Bureau of Investigation since August of 2010. In that time, Affiant has been responsible for the investigation of various federal violations including bank robberies, drug trafficking, firearms investigations, violent gangs, and other violent crimes.

The facts included in this affidavit were gathered by the Affiant or by other cooperating local, county, state, or federal law enforcement agencies. These facts may not represent all of the facts gathered to date, but only those necessary to establish probable cause in this matter.

At approximately 4:02 pm, on May 13, 2014, officers from the Odessa Police Department (OPD) were dispatched to the 1600 block of N Dixie Street in Odessa, Texas, in reference to a subject with a gun call. According to the 911 caller, a suspect was seen with an AK-47 style rifle. The caller also said a white male was assaulted at the scene (alley of 1600 block N Dixie) by several people in multiple vehicles. Two witnesses were later identified by OPD officers and investigators. According to these witnesses, an individual they knew as Sean Michael Lamb (LAMB), was giving them a ride in a blue Ford Expedition so that they could pay a bill. These witnesses stated LAMB received a call from an unknown person and, following the call, he told the witnesses that he had to meet someone to pick up some clothes. The two witnesses told OPD officers they were inside of the vehicle at the time of the incident at the scene (1600 block of North Dixie). Both witnesses said LAMB was abducted from the east alley of the 1600 block of N Dixie and driven away in the blue Ford Expedition. Witness #1 saw at least three vehicles pull into the alley, blocking LAMB and the Ford Expedition. Witness #1 and Witness #2 told OPD officers they exited the vehicle, due to the fact that they were uncomfortable with the situation when several people began assaulting LAMB as he sat in the driver's seat of the blue Ford Expedition. OPD Corporal Patrick Chadwick subsequently spoke to Jacqueline Pineda (PINEDA) at 2205 Stoner Road, Odessa, Texas who was identified as the owner of the blue Ford Expedition. Cpl. Chadwick reported that PINEDA advised him she loaned the vehicle to LAMB early in the afternoon.

At approximately 4:25 pm on May 13, 2014, OPD officers were dispatched to the area of 30 Neta Place in reference to a "shots fired" call. Upon arrival, they discovered a deceased male victim, later identified as LAMB, inside a blue Ford Expedition. LAMB had multiple gunshots to his torso and head. Further observation of LAMB inside of the vehicle, revealed that he was shot at contact or close to contact range from behind as he

sat in the front passenger seat of the blue Ford Expedition facing the front of the vehicle. Based on information developed through the investigation, OPD law enforcement personnel learned that LAMB, Steven Saenz (SAENZ) and Johnny San Miguel (SAN MIGUEL) had stolen a large quantity of methamphetamine and a black Chevrolet Tahoe from Liz Hernandez (L HERNANDEZ).

On May 14, 2014, OPD Investigators spoke with Jessica Ann Coder (CODER). CODER told OPD Investigators she last saw LAMB at 6700 W 25th, Odessa, Texas, on the night prior to LAMB's death. When CODER was asked about drug usage throughout the night, she stated she knew that SAENZ was in possession of a large quantity of methamphetamine. She further stated that SAENZ gave Andres Keyon Roman (ROMAN) a large amount of the methamphetamine and ROMAN owed SAENZ money for it. At some point during the night a quarter of an ounce (1/4) of methamphetamine came up missing from SAENZ and he was angry about this. She said that the entire time SAENZ was present in the residence he was giving out drugs to various people for them to sell.

On May 14, 2014, OPD Investigators received an anonymous Crime Stoppers tip that indicated the victim, LAMB, had robbed L HERNANDEZ of a large quantity of narcotics and a vehicle. OPD Officers subsequently located L HERNANDEZ and her son, Brian Hernandez (B HERNANDEZ) (DOB 11/16/1996), at her residence of 1101 Fitch #404, Odessa, Texas. L HERNANDEZ admitted that LAMB stole a quantity of narcotics and a vehicle from her residence where LAMB was living for a period of time following his release from Ector County Jail on May 7, 2014. L HERNANDEZ said the narcotics stolen actually belonged to her brother, Ruben James Hernandez (R HERNANDEZ), (DOB 01/04/1981).

On May 14, 2014, OPD Cpl. Patrick Chadwick interviewed L HERNANDEZ who admitted she was with her brother, R HERNANDEZ, and Noe Garcia GALAN (DOB 10/06/1979) and others on May 13, 2014. She said that on May 13, 2014, multiple people at the scene were armed with firearms during the assault on LAMB, including GALAN and HERNANDEZ. HERNANDEZ said following the assault, the blue Ford Expedition was driven away by the suspects with LAMB in the front passenger seat. She said the person sitting in the back left seat, behind the driver, was named Rudy Paredes (PAREDES). According to HERNANDEZ, they all, referring to all of the individuals involved with the abduction and assault on LAMB, went to confront LAMB about stealing the narcotics and her black Chevrolet Tahoe. L HERNANDEZ said GALAN and two other subjects forced LAMB into the passenger seat of the blue Ford Expedition vehicle by assaulting him.

On May 14, 2014, OPD Investigators learned L HERNANDEZ had outstanding warrants for her arrest and took her into custody. Upon arrival at the Ector County Law Enforcement Center, Ector County, Texas L HERNANDEZ made a statement to an Ector County employee that another subject who was in the booking area, later identified as Ray Olgin (OLGIN), was involved in the incident.

On May 14, 2014, OPD Cpl. John Sikes interviewed B HERNANDEZ. B HERNANDEZ said it was R HERNANDEZ's methamphetamine that was stolen from L HERNANDEZ's residence. B HERNANDEZ said L HERNANDEZ did not sell dope, she was just "holding it" for R HERNANDEZ. B HERNANDEZ told investigators that LAMB texted him, on May 13, 2014, about his clothing and then B HERNANDEZ informed his uncle, immediately after the contact with LAMB. B HERNANDEZ also told investigators he called his uncle, R HERNANDEZ on May 13, 2014, after speaking with LAMB, regarding where they were supposed to meet LAMB. B. HERNANDEZ was told by R HERNANDEZ when and where to set up the meeting. B HERNANDEZ set up the meeting with LAMB using the excuse to drop off clothing left by LAMB at 1101 Fitch #404, L HERNANDEZ' residence. The meeting was to take place in the alley near the intersection of 17th and Dixie in Odessa, Texas. L HERHANDEZ told OPD investigators the alley near 17th and Dixie is a known drug transaction location which is why LAMB and the other individuals involved knew of the location. According to B HERNANDEZ, he believed the purpose of this meeting was to assault LAMB for stealing the narcotics and vehicle. B HERNANDEZ said he had no idea that "this shit was going to go down." He thought "they" were just going to "mess him up."

B HERNANDEZ told OPD Investigators that upon his arrival at the intersection of 17th and Dixie, Odessa, Texas, he got out of his vehicle and walked up to the blue Ford Expedition to hand LAMB the clothing. B HERNANDEZ indicated he went to that location in a brown Dodge pickup truck. There was someone else with B HERNANDEZ when he went to confront LAMB; however, B HERNANDEZ did not provide a name. He only said the person with him was a friend of R HERNANDEZ. B HERNANDEZ stated that L HERNANDEZ, R HERNANDEZ, a white male with spikey hair (later identified as OLGIN), and GALAN were all present in the alley on 17th and Dixie. B HERNANDEZ claimed that there were numerous other people whom he did not recognize. As B HERNANDEZ began walking up to LAMB, who was sitting in the blue Ford Expedition, B HERNANDEZ said L HERNANDEZ, R HERNANDEZ, GALAN, and others arrived, blocking LAMB's vehicle in the alley. B HERNANDEZ stated that GALAN got out of the vehicle before anyone else and immediately walked up to the blue Expedition and got into the right side. Following this, B HERNANDEZ stated that the white mail with spikey hair, later identified as OLGIN, got into the drivers' seat of the vehicle. B HERNANDEZ stated that L HERNANDEZ also approached the blue Expedition and began asking LAMB where the vehicle and the narcotics were.

B HERNANDEZ admitted to setting up the meeting so that LAMB would show up because he stole from his (B HERNANDEZ's) family. B HERNANDEZ said several of the individuals involved with the assault pushed LAMB into the passenger seat and they drove away in the blue Ford Expedition. B HERNANDEZ said that following the abduction of LAMB at 17th and Dixie, they, referring to L HERNANDEZ, R HERNANDEZ, GALAN, LAMB, and others unnamed, all went to a hotel on Highway 80. Once at this location, B HERNANDEZ said LAMB was assaulted again, while they were looking for SAENZ in one of the rooms. Once at the Parkway Inn, B HERNANDEZ stated that they (B HERNANDEZ and the unnamed friend of R HERNANDEZ mentioned above) parked "in the back" and some of the subjects involved

went to the room looking for SAENZ. B HERNANDEZ stated the reason he remained inside of the vehicle was due to the fact he was afraid of what was happening.

According to B HERNANDEZ, after the stop at the Parkway Inn all of the cars involved left, with LAMB still in the blue Ford Expedition, and drove East on the service road of Highway 80. All of the individuals and vehicles involved then left that area and drove to the alley behind #30 Neta Place. During the interview with B HERNANDEZ on May 14, 2014, he never fully indicated who "they" were, just that others were involved with those he had already identified. Once LAMB was driven to the alley behind #30 Neta Place, B HERNANDEZ indicated that he lost sight of the vehicle. GALAN, R HERNANDEZ, and two other individuals, who B HERNANDEZ did not identify, were in the blue Ford Expedition, in the alley with LAMB, at the time that B HERNANDEZ lost sight with them. B HERNANDEZ stated that he witnessed the vehicle occupied by the subjects and LAMB drive into the alley, believed to be the alley behind #30 Neta Place.

B HERNANDEZ said he saw GALAN get into the back right seat of the vehicle, behind LAMB, when they first confronted LAMB in the alley near the intersection of 17th and Dixie. The following is a seat order inside the blue Ford Expedition, as described by B HERNANDEZ when he lost sight of the vehicle after it turned into the alley behind #30 Neta Place: white male with spikey hair (later identified as OLGIN) in the driver's seat, white male with shoulder length hair in the back left seat, GALAN in back right seat and LAMB in the front right seat.

On May 15, 2014, Stacey Castillo (CASTILLO) (DOB 06/16/1974) was arrested by U.S. Border Patrol agents in Marfa, Texas. During a subsequent interview conducted by Homeland Security Investigations (HSI) Special Agent Will Werner, on May 15, 2014, CASTILLO implicated herself, as well as L HERNANDEZ, PAREDES, B HERNANDEZ, R HERNANDEZ and GALAN in the abduction of LAMB. CASTILLO admitted she drove R HERNANDEZ to the U.S. international border with Mexico in Presidio, Texas where she dropped him off at a Valero gas station. R HERNANDEZ then took a taxi to Mexico to escape capture because R HERNANDEZ was aware that law enforcement was looking for him. HSI agents observed text messages from a "Ruben," in CASTILLO's cell phone, stating he had "already made it across." While talking to HSI Special Agent Werner, CASTILLO referred to R HERNANDEZ as a "shot caller" in a recent homicide in Odessa, Texas. CASTILLO stated she agreed to transport R HERNANDEZ in exchange for an introduction to a narcotics supplier that she could use in the future. CASTILLO also said GALAN was a member of the cartel and he received orders from Mexico to kill LAMB, SAENZ and SAN MIGUEL. CASTILLO never indicated which cartel she was referring to.

After being taken into custody by U.S. Border Patrol agents and making statements regarding R HERNANDEZ, OPD was contacted. OPD Cpl. Sikes and Cpl. Keith Hudgens interviewed CASTILLO on May 15, 2014. CASTILLO told Cpl Sikes and Cpl Hudgens "he shouldn't have did what he did." CASTILLO said LAMB was not the only one that was going to die and "they" were going to go after the other two

(presumably SAN MIGUEL and SAENZ). CASTILLO told Cpl Sikes and Cpl Hudgens that LAMB needed to be taught a lesson; however he did not need to be killed like he was. According to CASTILLO, SAENZ committed a theft from "the cartel people." CASTILLO said from her information, she believed SAENZ stole approximately three (3) to four (4) pounds of "ice" (Affiant knows from his law enforcement experience that "ice" is another term for methamphetamine). According to CASTILLO, they were after SAENZ because he was the one who committed the theft. CASTILLO further admitted to being in a vehicle in the alley when LAMB was assaulted and abducted. CASTILLO said while the assault and abduction were taking place she was consoling the uninvolved parties (to include a young child) that had exited LAMB's vehicle and telling them that it was going to be okay. CASTILLO told investigators that LAMB was yelling "I swear to God it was not me" during the abduction. CASTILLO claimed she begged LAMB to tell them where SAENZ was and he was going to be okay.

On May 15, 2014, OPD Cpl Sikes and Cpl. Hudgens also interviewed Anthony Gonzales (GONZALEZ). GONZALEZ was a passenger in the car with CASTILLO at the time of CASTILLO's arrest by U.S. Border Patrol Agents in Marfa, Texas. GONZALEZ said LAMB was supposed to meet L HERNANDEZ to pick up some clothes. They were supposed to meet LAMB in the area of 17th and Dixie. GONZALEZ was a passenger in CASTILLO's Kia automobile. GONZALEZ stated L Hernandez was also in the car with him and CASTILLO. Once they arrived in the alley, GONZALEZ said he did get out of the Kia but he did not approach LAMB. He witnessed L HERNANDEZ approach LAMB and began yelling and screaming at LAMB. GONZALEZ described L HERNANDEZ as being extremely angry. GONZALEZ stated that he witnessed L HERNANDEZ punch LAMB while LAMB was sitting inside of the blue Ford Expedition. GONZALEZ stated that he did not know many of the people there. GONZALEZ understood that LAMB was involved in the theft of a large quantity of narcotics but did not know the exact amount. GONZALEZ admitted to being in CASTILLO's Kia automobile that went to the Parkway Inn in Odessa. CASTILLO and GONZALEZ were stopped on May 15, 2014, by U.S. Border Patrol in the same Kia Vehicle. GONZALEZ said his intention was to "get the attention" of LAMB and give him an "ass whoopin" for stealing dope. GONZALEZ did not know the intentions of the other individuals involved.

On May 16, 2014, OPD Investigators located and obtained surveillance video from the Parkway Inn on East Highway 80, Odessa, Texas. OPD Investigators reviewed the video footage which showed multiple vehicles, including the blue Ford Expedition in which LAMB was found deceased, pull into the parking lot. OPD investigators also observed that multiple people confronted LAMB while the blue Ford Expedition was parked in the motel parking lot on May 13, 2014. OPD Investigators recognized CASTILLO, PAREDES (with a satchel), L HERNANDEZ, B HERNANDEZ and R HERNANDEZ. In the surveillance video, PAREDES could be seen getting into the rear driver's side seat of the blue Ford Expedition before it drove away. Also, L HERNANDEZ could be seen punching the front seat passenger (LAMB). Investigators also noticed that some of the individuals seen in the video went to a hotel door and appeared to be looking for someone (possibly SAENZ). The video showed all of the

vehicles and individuals leaving at the same time after multiple individuals went to a hotel room door but did not get an answer. Before leaving the area all of the individuals are seen approaching the front passenger's side of the blue Ford Expedition and they appear to be confronting someone sitting in the front passenger's seat (LAMB).

PAREDES (DOB 08/29/1980), who had been previously identified by L HERNANDEZ, was located on May 17, 2014, after he was stopped by Texas Department of Public Safety officers following an attempt to evade capture. OPD Investigators knew from a prior interview with L HERNANDEZ that after the assault at 17th and Dixie, the Ford Expedition was driven away with LAMB in the front passenger seat. L HERNANDEZ said the person sitting in the back left seat, behind the driver, was named Rudy Paredes

On May 17, 2014, OPD Cpl Sikes interviewed PAREDES. PAREDES admitted to being involved in the abduction and death of LAMB. PAREDES claimed he did not know in advance what was going to occur. PAREDES said the purpose of their (CASTILLO, GALAN, and others) contact with LAMB was to "scare him." PAREDES stated that he went to the Parkway Inn on East Highway 80. While PAREDES was at the Parkway Inn, he stated LAMB was in the Ford Expedition with a subject driving named Ray Olgin (OLGIN) (DOB 05/25/1974). PAREDES indicated he got into the back left passenger seat with OLGIN driving, LAMB in the front passenger seat and GALAN in the back right. PAREDES stated that GALAN had a firearm, which looked like a Tec-9 and had what appeared to be a suppressor on the end of it, pointed to the back of the seat where LAMB was sitting. According to PAREDES, GALAN was asking LAMB where the dope was and where his brother was, referring to SAENZ. PAREDES said he did not witness the shooting of LAMB due to the fact that he got out of the vehicle prior to LAMB being shot. PAREDES said "I was there, but I didn't kill anybody."

On May 17, 2014, OPD Cpl Sikes interviewed OLGIN. OLGIN admitted to being involved in the abduction and death of LAMB. OLGIN stated he was in the alley near the intersection of 17th and Dixie when multiple subjects confronted LAMB on May 13, 2014. OLGIN said he went with CASTILLO to confront LAMB. OLGIN said he told LAMB to get out of the Ford Expedition but did not "put hands on him." OLGIN then said LAMB was told to get in the vehicle and OLGIN began driving. OLGIN said while he was driving the blue Ford Expedition, LAMB was afraid. While driving, GALAN forced LAMB to put his seatbelt on and GALAN began strangling LAMB with the seatbelt. OLGIN began explaining to OPD Cpl. Sykes what occurred at the Parkway Inn on Highway 80.

OLGIN stated that once at the Parkway Inn, another individual (Affiant believes to be PAREDES) got into the seat behind OLGIN. OLGIN stated that PAREDES got out of the Ford Expedition while in the parking lot and tossed "a bag" to another vehicle and then got back in. It was at this point that OLGIN saw GALAN with a firearm. OLGIN stated that GALAN began ordering OLGIN where to go. OLGIN described driving to different alleys, looking for a place to stop as directed by GALAN. OLGIN said once he got to a certain alley (Affiant believes the alley of #30 Neta Place) a car pulled in front of


the Ford Expedition and blocked their path. OLGIN said he realized this was his time to get away, at which point he jumped from the vehicle and began to run away. OLGIN said he heard what he thought to be a gunshot and believed that he heard a bullet go by him and he believed that GALAN was firing at him (OLGIN).

On May 14, 2014, OPD investigators observed and photographed LAMB, still seat-belted in the front passenger seat of the blue Ford Expedition in the alley behind #30 Neta Place, Odessa, Texas. LAMB was shot while wearing the seatbelt. Affiant believes this fact, that LAMB was wearing a seatbelt, was never released in affidavits or reported by the media. Affiant also believes the fact that LAMB was wearing a seatbelt at the time of the shooting, and other details associated of why he was wearing the seatbelt, could only have been known by someone closely associated with the abduction and shooting of LAMB.

On May 18, 2014, SAENZ was taken into custody by OPD for an Aggravated Robbery warrant. SAENZ agreed to talk with OPD investigators. SAENZ began the interview by stating that he was in fear for his life from the people that killed LAMB. He stated that "they" were going to get to him and do the same thing to him. SAENZ was asked why "everybody" was saying that he was in possession of a large amount of narcotics prior to LAMB's death. SAENZ could not provide a response and became defensive to the question. SAENZ blamed SAN MIGUEL for stealing narcotics from L HERNANDEZ. SAENZ said the last time he heard from LAMB was May 13, 2014. LAMB told him that he was going to go pick up clothing from B HERNANDEZ and then was going to go meet SAENZ. SAENZ stated that this was the last time he heard from LAMB. SAENZ consistently maintained that SAN MIGUEL was the person who stole the methamphetamine. According to SAENZ, SAN MIGUEL was blaming SAENZ for everything.


It is requested that the warrant and accompanying affidavit in support thereof, as they reveal an ongoing investigation, be sealed until further order of the Court in order to avoid premature disclosure of the investigation, guard against the flight of fugitives, and better ensure the safety of agents and others, except that copies of the warrant in full or redacted form may be maintained by the United States Attorney's Office, and may be served on Special Agents and other investigative and law enforcement officers of the Federal Bureau of Investigation, federally deputized state and local law enforcement officers, and other government and contract personnel acting under the supervision of such investigative or law enforcement officers, as necessary to effectuate the warrant.

Based on the above, Affiant believes that the facts as described in this affidavit represent probable cause to arrest Rudy Paredes with conspiracy to possess with intent to distribute a controlled substance in violation of Title 21 USC section 846 and Title 21 section 841(a)(1).



Joshua J. Pirtle
Special Agent, Federal Bureau of Investigation

Sworn to and subscribed before me on this 7th day of August, 2014.



David Counts
United States Magistrate Judge